

DECLARATION OF KAREN DENNY
Pursuant to 28 U.S.C. § 1746

I, Karen Denny, have personal knowledge of the facts and matters set forth below. If called as a witness, I could and would testify as follows:

1. My name is Karen Denny. I am over the age of 18 and reside in Fort Lauderdale, Florida.
2. In approximately September 2023, I found a company online called FBA Machine that could manage a third-party e-commerce store on Amazon for me so that I could make some additional income. I filled out an online form and then I spoke with a salesperson named Wes. He told me about a “Done With You” package FBA Machine offers where I could get personal training with the CEO of the company, Steven. Wes told me there was a guarantee that the company would get my store to about \$12,000 in sales within a short amount of time, and he told me that it could become a six-figure income for me if I scaled it. He also told me that I could reasonably expect to make 18% to 20% profit on items I’d sell in my store.
3. Below is an email that Wes sent me during our sales conversations.

Funding Options & Next Steps - Tues Sept 26th 6pm EST ➔ [Inbox x](#)



Wes W <wes@thefbamachine.com>
to me ▾

Hi Karen,

Look forward to meeting again... We should be able to walk through everything in about 15min. I left it at 30min so there is no rush. Chat soon!

Here is the link to join the call: <https://meet.google.com/ygx-juxf-zss>

Thank you,

Wes
The FBA Machine
[REDACTED]

4. Under the “Done With You” model, FBA Machine would do all the work running my store, but I would learn how to run a store along the way. Wes told me he was growing his own

Amazon store too. He also tried to refer me to a few financing companies that could give me a no-interest loan, but I was not approved.

5. I decided to purchase the business opportunity using cash and spent \$7500 for the initial fee for the “Done With You” program. Before purchasing, I searched online for FBA Machine. The company didn’t have any bad reviews, and I saw that a number of other automation companies that did. FBA Machine even had a couple of good reviews, so I thought the company was legitimate.
6. I never received any document from FBA Machine with any information substantiating their earning and profit claims made over the phone with the sales agent. I also never received a document from FBA Machine (or any associated companies) telling me whether the company has been subject to legal action or a list of consumers who purchased their services in the past 3 years.
7. After I purchased, I was assigned a virtual assistant who appeared to be in another time zone, I believe in Asia. The virtual assistant was hard to reach, hardly communicated, and did not speak English very well. I only heard from him when I had to authorize inventory orders for my store. He was unable to answer my questions when I asked about reviewing my inventory and analyzing reports on my store’s performance.
8. I also had calls with Jerdonna and Melissa to try to understand what items were being purchased for my store, how much they cost, and how much I could expect to earn in profit from them.
9. FBA Machine signed me up for sales support software which cost me an additional \$99 per month. This was supposed to help manage my store. In addition, the company signed me up with a distributor named KeHe, a company that sells food products, and Frontier,

another distributor. KeHe and Frontier would debit my account for inventory. At one point, there was a product on backorder, and KeHe debited my account after several months in the amount of \$2500. I had forgotten about those products, and I was upset that I did not receive any notice that my account would be debited.

10. FBA Machine also started harassing me to give my credit card information to subscribe me to 3PL, a service it used to package and ship items to Amazon. I felt like there were a lot of hidden charges I was not informed about before I purchased.
11. I spent approximately \$5,000 in addition to my initial fee for vendors, sales support software, and Amazon fees, and yet I had negative income. My store did not make the amount of money I was promised.
12. I never received any training from Steven, even though this was how the model was sold to me.
13. Prior to signing up for FBA Machine, I searched online to see if there were any negative reviews and could find NOTHING.
14. I lost over \$12,000 with FBA Machine through May 2024. I was told I would make 18% to 20% profit on items sold in my store, and that never happened.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 9th, 2024
Fort Lauderdale, Florida


Karen Denny